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#### PROPOSED COUNSEL FOR DEBTORS AND DEBTORS IN POSSESSION

## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

In re

Energy & Exploration Partners, Inc., et al.,

Debtors.<sup>1</sup>

Chapter 11

Case No. 15-44931 (RFN)

(Jointly Administered)

# WITNESS AND EXHIBIT LIST FOR DECEMBER 22, 2015 FINAL HEARING ON FIRST DAY MOTIONS

Energy & Exploration Partners, Inc. ("ENXP, Inc.") and its affiliated debtors and debtors in possession (collectively, the "Debtors") hereby file their witness and exhibit list for the final hearing on the motions below on December 22, 2015 at 9:30 a.m. (CST) ("Witness and Exhibit List") as follows:

### **WITNESSES**

- John R. Castellano
- Any witness called by another party

<sup>1</sup> The Debtors in these chapter 11 cases are: Energy & Exploration Partners, Inc. (9466); Energy & Exploration Partners, LLC (8621); Energy & Exploration Partners Operating GP, LLC (4266); and Energy & Exploration Partners Operating, LP (4049). The Debtors' main corporate and mailing address for purposes of these chapter 11 cases is: Energy & Exploration Partners, 420 Throckmorton St., Suite 1200, Fort Worth, TX 76102.

The Debtors reserve the right to call rebuttal witnesses as necessary. The Debtors reserve the right to call any witness identified or called by another party or by the Court. The Debtors reserve the right to not call any witness identified herein. The Debtors reserve the right to supplement this witness list.

#### **EXHIBITS**

Ex.	Description	Offered	Objection	Admitted/ Not Admitted
1	Declaration of John R. Castellano, Interim Chief Financial Officer of ENXP Inc., in Support of Chapter 11 Petitions and First Day Pleadings			
2	Prime Clerk Engagement Agreement			
3	Declaration of Michael J. Frishberg in Support of Debtors' Application for Appointment of Prime Clerk LLC as Claims and Noticing Agent			
4	Affidavit of Service on Utilities Service List for Interim Order (I) Determining Adequate Assurance of Payment for Future Utility Services, (II) Prohibiting Utility Providers From Altering, Refusing or Discontinuing Utility Service and (III) Establishing Adequate Assurance Procedures and Setting a Final Hearing			
5	Debtors' Utility Service Providers List			
6	Debtors' Insurance Providers and Policies List			
7	List of Taxing Authorities			

The Debtors reserve the right to utilize additional rebuttal exhibits as necessary. The Debtors reserve the right to supplement this Exhibit List. The Debtors reserve the right to use as its own exhibit any exhibit identified or offered by any other party.

WHEREFORE, the Debtors respectfully request that the Court grant the relief requested herein and such other and further relief as is just and proper.

Respectfully Submitted,

## **BRACEWELL & GIULIANI LLP**

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-and-

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